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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
12

13 ADRIAN ROMERO,
14 Plaintiff,
15 v.

16 COUNTY OF LOS ANGELES;
17 SERGIO CAMPOS; DAMIEN
GUERRERO; JUSTIN PEREZ; and
18 DOES 1-10, inclusive,
19 Defendants.

Case No. 2:23-cv-02025-GW(PVCx)

**JOINT STATUS REPORT RE
STATUS OF SETTLEMENT**

[Assigned to Hon. George H. Wu
Courtroom 9D]

20
21 **TO THIS HONORABLE COURT:**

22 Defendants, COUNTY OF LOS ANGELES, SERGIO CAMPOS, DAMIEN
23 GUERRERO and JUSTIN PEREZ and Plaintiff, ADRIAN ROMERO, (“Parties”)
24 jointly, submit this status report in advance of the scheduled Status Conference on
25 January 16, 2025.

26 **RECITALS**

27 1. On January 12, 2024, the parties participated in a mediation with
28 ADR Panel Mediator Richard Copeland and all parties reached a settlement

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1 agreement to resolve the matter in its entirety. The Parties signed a stipulation for
2 settlement on that date.

3 2. The settlement is conditioned upon the approval by the relevant Los
4 Angeles County boards, including the Los Angeles County Claims Board and the
5 Board of Supervisors, which defense counsel will be recommending. As
6 previously advised, the process of obtaining approvals from the Los Angeles
7 County Claims Board and Board of Supervisors is expected to take 9-12 months
8 from the date the settlement agreement is fully executed by the parties.

9 3. Plaintiff received the draft of the settlement agreement from Defense
10 Counsel on March 21, 2024. The County received the executed settlement
11 agreement from Plaintiff on June 12, 2024.

12 4. The Los Angeles County Board of Supervisors has established
13 protocols in lawsuits. Where the liability of the settlement or judgment exceeds
14 \$100,000, a Corrective Action Plan (CAP) (a confidential document) and a
15 Summary Corrective Action Plan (SCAP) (a public record) must be produced.

16 5. After the subject settlement agreement was fully executed, the
17 settlement moved on to the CAP phase. The CAP process involves several steps
18 in its preparation, including investigation, drafting, and revisions, followed by
19 approval of multiple levels of LASD personnel. The County is in the CAP process
20 phase of the approvals process. Most recently, the draft CAP was reviewed by
21 the CEO and returned to the Los Angeles Sheriff's Department for revisions.

22 6. Once the final review and signatures are completed in the CAP
23 process, the matter will be placed on the agenda for approval by the Claims
24 Board.

25 7. After approval by the Claims Board, the matter will typically go
26 before the Board of Supervisors within approximately 60 days. After the County
27 Board of Supervisors' approval, the settlement documents and Plaintiff's payment
28

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1 instructions will be submitted to the Los Angeles County Auditor-Controller, and
2 then the settlement payment will be issued.

3 8. The Parties request the Court allow additional time for the settlement
4 approval process to proceed.

5 9. Accordingly, the parties request that the Court set a status
6 conference in approximately four (4) months so that the parties may update the
7 Court regarding the status of the approval of the settlement.

8
9 DATED: January 14, 2025

HURRELL CANTRALL LLP¹

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12 By: /s/ Katherine E. Orletsky
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26 DATED: January 14, 2025

LAW OFFICES OF DALE K. GALIPO

27 By: /s/ Shannon J. Leap
28 Dale K. Galipo
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Attorneys for Plaintiff

¹ Defendants' undersigned counsel attests that all other signatories listed, and on whose behalf this filing is submitted, concur in the document's content and have authorized the filing.